

246516

UNITED BOATMEN

RAYMOND D. BOGAN, Esq.
LEGAL COUNSEL
08742

526 BAY AVENUE
PT. PLEASANT BCH, NJ
(732) 899-9500
Fax (732) 899-9527

June 16, 2003

Honorable Olympia J. Snowe
Chair, Oceans, Fisheries and
Coast Guard Subcommittee
United States Senate
Washington, DC 20510

Honorable Frank A. Lobiondo
Chair, Coast Guard and
Maritime Transportation Subcommittee
U.S. House of Representatives
Washington, DC 20515-3002

Docket Management Facility
[USCG-2001-8773] - 39
U.S. Dept. of Transportation
400 Seventh St., S.W., Rm. PL-401
Washington, DC 20590-0001

DEPT. OF TRANSPORTATION
DOCKETS

2003 JUN 20 P 10 05

Re: Post-accidental testing measures

Dear Sir/Madam:

The United Boatmen of New Jersey and New York is an organization which represents charter and party boat businesses in the two states.

The United Boatmen respectfully objects to the proposed U.S. Coast Guard requirements to implement new post-accident alcohol testing measures after a serious marine incident. The requirement to carry alcohol screening devices onboard for-hire vessels, and the related crew training, would impose a significant burden on these small businesses.

It is the position of the United Boatmen that Congress intended for the Coast Guard to conduct post-incident alcohol testing. This delegation of obligations to these private entities is not only burdensome but also imprudent. There are quality control issues, as well as concerns regarding objectivity and testing. The majority of trips taken by these vessels are within two hours of port. The Coast Guard can, and does, respond to any

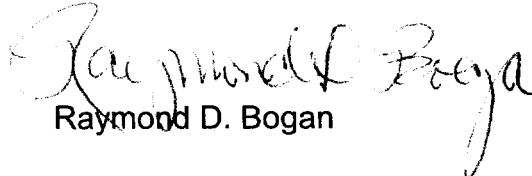
June 16, 2003

incidents, which might occur on these vessels and administer the appropriate test. This obligation may also detract from the crew's primary obligation to address post incident safety issues.

Finally, with the many costs already being imposed on these small businesses, the cost of the devices might still be too expensive for the smallest commercial vessel operators and owners.

United Boatmen respectfully submits that the Coast Guard is the appropriate entity to handle these screenings.

Respectfully submitted,



Raymond D. Bogan

RDB/ck